

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Application by Verizon New Jersey Inc.,)	
Bell Atlantic Communications, Inc. (d/b/a Verizon)	WC Docket No. 02-67
Long Distance) NYNEX Long Distance)	
Company (d/b/a Verizon Enterprise Solutions),)	
Verizon Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization To Provide)	
In-Region, InterLATA Services in New Jersey)	
)	

DECLARATION OF ANDREA T. SANJUAN

1. I, Andrea T. SanJuan, declare the following.
2. Currently, I am the Director of Process Engineering at Metropolitan Telecommunications (MetTel), and my business address is 44 Wall Street, New York, New York 10005.
3. I have been involved with telecommunications for nine (9) years. My experience includes employment with New York Telephone Company and Bell Atlantic/NYNEX as well as work as an independent consultant, for MetTel, on Verizon New York Bill Reconciliation.
4. The purpose of my Declaration is to identify and present the current situation MetTel is experiencing with Verizon's-New Jersey BOS BDT monthly bill.
5. The BOS BDT file for MetTel's March UNE-P invoice as received was incomplete. Critical records that indicate the level of subtotals being displayed were missing. Consequently, although subtotal amounts are displayed, it is impossible to ascertain what that subtotal represents (i.e. whether it is for a circuit ID, TN, etc.). MetTel opened trouble ticket # 553568 to have the problem corrected and the file recreated. Verizon advised that they were investigating the issue and would get back to MetTel with their result.
6. The same problem persisted in April and May and was reported each time to Verizon. Examples were provided to Verizon with each notification. By May, Verizon was able to identify the cause of the missing records.

7. According to Verizon, a change was made to MetTel's NJ UNE-P account. Where normally MetTel is billed a "J" (Platform) bill, MetTel is now being billed an "N" (Loop) bill and since certain records do not exist in the "N" type of billing that exist on the "J" type, some records will not be created. No one at Verizon has been able to advise why this problem has occurred.
8. Verizon has been able to identify that this problem exists with other CLECs as well and a manual fix will have to be instituted to correct the issue.
9. MetTel has not been advised what the initial cause of the problem was, when the manual fix will be instituted, when a permanent fix will be installed or when corrected bills will be provided.
10. Until corrected BOS BDT files are provided, MetTel will be unable to reconcile the Verizon bills.
11. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct according to the books and records of MetTel and the best of my knowledge and belief.

Executed on June 10, 2002

Andrea T. SanJuan